REMARKS

Applicants request reconsideration and allowance of the present application in view of the foregoing amendments and the following remarks.

. . .

Claims 1, 3, and 25 are pending in the present application. Claims 1, 3, and 25 are the independent claims.

Claims 1, 3, and 25 have been amended. No new matter has been added.

Claims 1 and 3 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,540,337 (Pollard). Claim 25 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Pollard in view of U.S. Patent No. 6,561,632 (Feinn et al.). All rejections are respectfully traversed.

Independent claims 1, 3, and 25 now variously recite a second trench (formed at a second surface) directly connected with a first trench (formed at a first surface).

However, Applicants submit that neither <u>Pollard</u> nor <u>Feinn et al.</u> teach or suggest at least the aforementioned features of independent claims 1, 3, and 25. Thus, without conceding the propriety of the asserted combination, the asserted combination is likewise deficient, even in view of the knowledge of one ordinarily skilled in the art.

By the aforementioned features, influence on the chamber and heater on the first surface of the substrate is minimized by forming the first trench on one surface of the substrate and the second trench on another surface of the substrate. This advantage is recognized by neither Pollard nor Feinn et al.. Thus, it is submitted that the aforementioned feaure is not obvious over the cited art.

In view of the foregoing, Applicants respectfully submit that the independent claims patentably define the present invention over the citations of record. Further, the dependent claims should also be allowable for the same reasons as their respective base claims and further due to the additional features that they recite. Separate and individual consideration of the dependent claims is respectfully requested.

There being no further outstanding objections or rejections, it is submitted that the present application is in condition for allowance. An early action to that effect is courteously solicited.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

Date: 1-12-07

By:

Michael E. Kondoudis Registration No. 42,758

1201 New York Avenue, NW, Suite 700

Washington, D.C. 20005 Telephone: (202) 434-1500 Facsimile: (202) 434-1501